

SEALED

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

UNITED STATES OF AMERICA

v.

ROBERTO OMAR VERA (1)
KAMERON PAUL VERA (2)
ROBERTO TREVIZO MUNOZ (3)
SIMON LOUIS TREVINO (4)
JORGE MORALES (5)
KNEELY DENAY ABADIE (6)
STEPHANIE JEAN ALDAVA (7)
 aka STEPHANIE JEAN BRADLEY
 aka STEPHANIE JEAN MAY
 aka STEPHANIE JEAN BRISTOW
RODNEY ALLEN BROACH (8)
ANGELA DANIELLE BURKHAM (9)
ELIZABETH NEELY CAUSEY-ECK (10)
MARK ALLEN CRAVEN (11)
LAUREN ALLYSON CRITES (12)
 aka LAUREN ALLYSON ANDERSON
CHARLEY SEAY CROSSLAND (13)
 aka CHARLEY DENISE SEAY
ARTHUR DANIEL CURRIE (14)
 aka AQUAMAN
CAITLYN TAYLOR JOHNSON (15)
CHELSEA LORAIN JOHNSON (16)
ILONA KLONOWSKI KING (17)
 aka ILONA KLONOWSKI BRAZEAL
LARRY RAY LINCKS (18)
DANIEL MOSS (19)
JOHN CRAIG OWEN (20)
CLISTY DIANE PRATT (21)
 aka CLISTY DIANE BAKER
PAUL WADE SHREVES (22)
BRANDI SCOTT TURCOLA (23)
 aka BRANDI SCOTT BLACKBURN
 aka BRANDI SCOTT SMITH

2017 FEB 23 P 2:57

FILED UNDER SEAL

DEPUTY CLERK *COO*

NO. 3:17-CR-17

Supersedes Indictment returned on
January 10, 2017

Defendants are not listed in order of
culpability or hierarchy regarding
drug trafficking activities

SUPERSEDING INDICTMENT

The Grand Jury charges:

Count One

Conspiracy to Possess with Intent to Distribute a Controlled Substance
[Violation of 21 U.S.C. § 846]

Between on or about January 1, 2016 and on or about February 22, 2017, in the Dallas Division of the Northern District of Texas and elsewhere, the defendants, **Roberto Omar Vera, Kameron Paul Vera, Roberto Trevizo Munoz, Simon Louis Trevino, Jorge Morales, Kneely Denay Abadie, Stephanie Jean Aldava, Rodney Allen Broach, Angela Danielle Burkham, Elizabeth Neely Causey-Eck, Mark Allen Craven, Lauren Allyson Crites, Charley Seay Crossland, Arthur Daniel Currie, Caitlyn Taylor Johnson, Chelsea Loraine Johnson, Ilona Klonowshi King, Larry Ray Links, Daniel Moss, John Craig Owen, Clisty Diane Pratt, Paul Wade Shreves, and Brandi Scott Turcola** knowingly and intentionally combined, conspired, confederated and agreed with each other and with other persons known and unknown to the Grand Jury, to possess with intent to distribute five hundred grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A).

All in violation of 21 U.S.C. § 846.

Counts Two through Twenty-Six
 Possession with Intent to Distribute a Controlled Substance
 [Violation of 21 U.S.C. § 841(b)(1)(C)]

On or about the dates listed below, in the Dallas Division of the Northern District of Texas and elsewhere, the defendants listed below, knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) & (b)(1)(C).

Count	Defendant	On/In or About
2	Roberto Omar Vera	March 31, 2016
3	Kameron Paul Vera	May 9, 2016
4	Roberto Trevizo Munoz	December 1, 2016
5	Roberto Trevizo Munoz	January 5, 2017
6	Simon Louis Trevino	October 21, 2016
7	Simon Louis Trevino	December 2, 2016
8	Jorge Morales	December 20, 2016
9	Kneely Denay Abadie	June 2015
10	Stephanie Jean Aldava	December 2014 to October 2016
11	Rodney Allen Broach	September 14, 2015 to September 14, 2016
12	Angela Danielle Burkham	January 2016 to October 2016
13	Elizabeth Neely Causey-Eck	September 8, 2016
14	Mark Allen Craven	January to August 2016
15	Lauren Allyson Crites	January 2016 to July 2016
16	Charley Seay Crossland	March 2016 to October 2016
17	Arthur Daniel Currie	January 2016 to June 2016
18	Caitlin Taylor Johnson	February 2016 to December 2016
19	Chelsea Loraine Johnson	July to November 2016
20	Illona Klonowshi King Brazeal	January 2016 to September 2016
21	Larry Ray Lincks	March 2016 to September 2016
22	Daniel Moss	June 23, 2016
23	John Craig Owen	January 2016 to August 2016
24	Clisty Diane Pratt	June 2016 to July 2016
25	Paul Wade Shreves	January to October 2016
26	Brandi Scott Turcola	January 2016 - August 2016

Count Twenty-Seven

Possession with Intent to Distribute a Controlled Substance
[Violation of 21 U.S.C. § 841(b)(1)(C)]

On or about March 31, 2016, in the Dallas Division of the Northern District of Texas and elsewhere, **Roberto Omar Vera**, knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1) & (b)(1)(C).

Count Twenty-Eight

Possession with Intent to Distribute a Controlled Substance
[Violation of 21 U.S.C. § 841(b)(1)(C)]

Between on or about March 17, 2016, and on or about May 9, 2016, in the Dallas Division of the Northern District of Texas and elsewhere, **Kameron Paul Vera**, knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1) & (b)(1)(C).

Count Twenty-Nine

Possession of a Firearm by a Felon

[Violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2)]

On or about December 28, 2016, in the Dallas Division of the Northern District of Texas, the defendant, **Roberto Omar Vera**, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, that is (1) a Ruger Sturm, Model P89, 9 mm, and (2) a Smith & Wesson, model Mp9, Shield 9 mm, in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

Count Thirty

Possession of a Firearm by a Felon

[Violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2)]

On or about September 1, 2016, in the Dallas Division of the Northern District of Texas, the defendant, **Larry Ray Lincks**, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, that is a Taurus 9mm Handgun (S/N: TEP98221), in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

Forfeiture Notice

[21 U.S.C. § 853(a); 18 U.S.C. § 924(d); 28 U.S.C. § 2461(c)]

The allegations contained in Counts 1 through 30 of this Superseding Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

Upon conviction for any of Counts One through Twenty-Eight of this Indictment and pursuant to 21 U.S.C. § 853(a), the defendants, **Roberto Omar Vera, Kameron Paul Vera, Roberto Trevizo Munoz, Simon Louis Trevino, Jorge Morales, Kneely Denay Abadie, Stephanie Jean Aldava, Rodney Allen Broach, Angela Danielle Burkham, Elizabeth Neely Causey-Eck, Mark Allen Craven, Lauren Allyson Crites, Charley Seay Crossland, Arthur Daniel Currie, Caitlyn Taylor Johnson, Chelsea Loraine Johnson, Ilona Klonowshi King, Larry Ray Links, Daniel Moss, John Craig Owen, Clisty Diane Pratt, Paul Wade Shreves, and Brandi Scott Turcola**, shall forfeit to the United States of America all property, real or personal, constituting, or derived from, the proceeds obtained, directly or indirectly, as a result of the respective offense; and any property, real or personal, used or intended to be used, in any manner or part, to commit or facilitate the commission of the respective offense.

The allegations contained in Counts Twenty-Nine and Thirty of this Superseding Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction for the offenses alleged in Count 30 of this Superseding Indictment and pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), the defendants, **Roberto**

Omar Vera and **Larry Ray Links**, shall forfeit to the United States of America all property, real or personal, constituting, or derived from, the proceeds obtained, directly or indirectly, as a result of the offense; and any property, real or personal, used or intended to be used, in any manner or part, to commit or facilitate the commission of the offense.

Specifically, this includes \$6,642 in cash (as to **Vera**) and the following firearms:

- a Ruger Sturm, Model P89, 9 mm, serial number 305-96954 (as to **Vera**),
- a Smith & Wesson, model Mp9, Shield 9 mm, serial number HUN6118 (as to **Vera**),
- a Sturm, Ruger, and Co. Inc. model P94 [P944] pistol, .40 caliber, serial number 341-02043 (as to **Vera**),
- Charter Arms Corporation model undercover revolver, .38 special caliber, serial number 528583 (as to **Vera**),
- Diamondback Firearms model DB380 pistol, .380 Auto caliber, serial number ZH1208, (as to **Vera**),
- Taurus 9mm Handgun, serial number TEP98221 (as to **Lincks**), and
- Ammunition found connected to the above named firearms (as to both **Vera** and **Lincks**).

A TRUE BILL



FOREPERSON

JOHN R. PARKER
UNITED STATES ATTORNEY



P.J. MEITL

Assistant United States Attorney
District of Columbia Bar No. 502391
Virginia Bar No. 73215
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214.659.8680
Facsimile: 214.659.8812
Email: philip.meitl@usdoj.gov



JOHN KULL

Assistant United States Attorney
Texas Bar No.
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214.659.8600
Facsimile: 214.659.8812
Email: john.kull@usdoj.gov

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

ROBERTO OMAR VERA (1), KAMERON PAUL VERA (2),
ROBERTO TREVIZO MUNOZ (3), SIMON LOUIS TREVINO (4),
JORGE MORALES (5), KNEELY DENAY ABADIE (6),
STEPHANIE JEAN ALDAVA (7) aka STEPHANIE JEAN BRADLEY
aka STEPHANIE JEAN MAY, aka STEPHANIE JEAN BRISTOW
RODNEY ALLEN BROACH (8), ANGELA DANIELLE BURKHAM (9)
ELIZABETH NEELY CAUSEY-ECK (10), MARK ALLEN CRAVEN (11)
LAUREN ALLYSON CRITES (12), aka LAUREN ALLYSON ANDERSON
CHARLEY SEAY CROSSLAND (13), aka CHARLEY DENISE SEAY
ARTHUR DANIEL CURRIE (14), aka AQUAMAN, CAITLIN TAYLOR
JOHNSON (15), CHELSEA LORAIN JOHNSON (16),
ILLONA KLONOWSKI KING (17), aka ILLONA KLONOWSKI BRAZEAL
LARRY RAY LINCKS (18), DANIEL MOSS (19), JOHN CRAIG OWEN (20)
CLISTY DIANE PRATT (21), aka CLISTY DIANE BAKER,
PAUL WADE SHREVES (22), BRANDI SCOTT TURCOLA (23), aka BRANDI
SCOTT BLACKBURN aka BRANDI SCOTT SMITH

INDICTMENT

21 U.S.C. § 846

Conspiracy to Possess with Intent to Distribute a Controlled Substance

21 U.S.C. § 841(b)(1)(C)

Possession with Intent to Distribute a Controlled Substance

18 U.S.C. §§ 922(g)(1) and 924 (a)(2)

Possession of a Firearm by a Felon

21 U.S.C. § 853(a)

Forfeiture Notice

30 Counts


A true bill rendered

DALLAS

FOREPERSON

Filed in open court this 22nd day of February, 2017.

Warrant to be Issued KNEELY DENAY ABADIE (6), STEPHANIE JEAN ALDAVA (7) aka STEPHANIE JEAN BRADLEY aka STEPHANIE JEAN MAY, aka STEPHANIE JEAN BRISTOW, RODNEY ALLEN BROACH (8), ANGELA DANIELLE BURKHAM (9), ELIZABETH NEELY CAUSEY-ECK (10), MARK ALLEN CRAVEN (11), LAUREN ALLYSON CRITES (12), aka LAUREN ALLYSON ANDERSON, CHARLEY SEAY CROSSLAND (13), aka CHARLEY DENISE SEAY, ARTHUR DANIEL CURRIE (14), aka AQUAMAN, CAITLIN TAYLOR JOHNSON(15), CHELSEA LORAINNE JOHNSON (16), ILLONA KLONOWSHI KING (17), aka ILLONA KLONOWSKI BRAZEAL, LARRY RAY LINCKS (18), DANIEL MOSS (19), JOHN CRAIG OWEN (20), CLISTY DIANE PRATT (21), aka CLISTY DIANE BAKER, PAUL WADE SHREVES (22), BRANDI SCOTT TURCOLA (23), aka BRANDI SCOTT BLACKBURN aka BRANDI SCOTT SMITH


UNITED STATES MAGISTRATE JUDGE
Criminal No. 3:17-CR-17